

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.)
)
)
KASH LEE KELLY,) 15 CR 72-37
) Judge Philip P. Simon
)
)
)
Defendant.)

**KASH KELLY'S MOTION TO
EXPAND CONDITIONS OF BOND**

NOW COMES Defendant, KASH LEE KELLY, through his attorney, JOSHUA B. ADAMS, and respectfully moves this honorable court . In support of his motion Mr. Kelly states the following.

1. Sentencing is currently set for January 8, 2021.
2. Counsel has been diligently preparing for sentencing and discussing the PSI and sentencing issues with Mr. Kelly via telephone.
3. Additionally, Mr. Kelly has been active on social media advocating for peaceful protests during these recent times of social unrest. *See* Twitter: @KashLeeKelly1, Instagram: @kashleekelly
4. As a result, Mr. Kelly has been invited to speak at various non-violence seminars and meetings in Texas, New York, Indiana and Wisconsin.
5. Because of the current conditions of his bond, Mr. Kelly is unable to leave the Northern District of Indiana.

6. The government does not object to this modification request.
7. Moreover, Mr. Kelly will provide Pre-Trial services with itineraries of each of his trips and report to his officer when he returns to the Northern District of Indiana.

Respectfully submitted,

/s/Joshua B. Adams
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